



Richard/Carson & Associates, LLC

Consulting and Management

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Louisiana Public Service Commission
Attention: Kimberly O'Brian
Assistant to the Legal Department
602 North Fifth Street (Galvez Building)
Baton Rouge, Louisiana 70802-9154
Email: kim.obrian@la.gov
Email: Kathryn.bowman@la.gov
November 30, 2021

Re: RFP 21-31
Docket No. X-36093
In Re: Proceeding to Review the Current Status
and Future Plans for Traditional Telephone Services

Dear Kimberly:

Richard/Carson & Associates, LLC is pleased to respond to the Louisiana Public Service Commission RFP referenced hereinabove to assist the Commission in the proceedings of docket X-36093 to determine the current status of all traditional telephone services within the state and future plans the carriers have in terms of continued availability, customer service, pricing, and transition to newer technology over time. Richard/Carson & Associates, LLC will also assist Commission in-house Staff in an investigation and review of outage reporting, customer complaint handling, repair appointments, bill credits, network status reports provided to the LPSC, reporting of restoration activities and improvements needed to ensure network reliability.

Our proposal is incorporated herein, as follows:

A) SCOPE OF REPRESENTATION

In response to the scope of representation outlined in the RFP, Richard/Carson & Associates, LLC and its principal consultant Mr. Demint propose the following plan of action which would include, but may not be limited to, the following necessary efforts: conducting independent research and analysis of all factual and policy issues associated with traditional telephone service plans and procedures, including but not limited to, Commission directive items in Docket X-36093; preparation and analysis of discovery, including request for comment, drafting of data and informational requests, and additional requests for comment/information as deemed necessary; participation in conferences and meetings with telecommunications carriers, intervenors, Staff, or Commissioners; preparation for and participation in Technical Conference if appropriate; assist in drafting a report to the Commission, including Staff Recommendation and proposed rules or regulations; participation in Commission Business and

Executive Sessions where this docket may be discussed and considered, including the availability to answer questions or provide testimony as required.

B) PROPOSED WORK PLAN

As outlined in the RFP, it is projected that Richard/Carson & Associates, LLC and its principal consultant Richard Demint will be assisting Commission Staff (Legal, Utilities and/or Auditing Divisions) in the following specific activities:

1. Conducting a review/assessment of traditional telephone service plans for each carrier type (ILEC, RLEC, and Interconnected VoIP). Evaluate plans on availability, pricing, features, customer service (ordering and repair) including billing processes and credit/adjustment practices.
2. Evaluation of carrier plans for transition/migration of traditional telephone service plans to new technologies over time.
3. Conducting a review/assessment of outage reporting, customer complaint handling, repair appointments, bill credits (proactive and reactive), network status and restoration activity reporting provided to the LPSC during and immediately following storm, flooding, and other disaster conditions.
4. Analysis/evaluation of telecommunications carrier reliability, performance and responsiveness during disaster events based on experience (2014 to present) and recommendations for improvement.
5. Participation in conferences and/or meetings with representatives from various telecommunications carriers, Staff, or Commissioners as required.
6. Drafting data and informational requests to the traditional telephone carriers regarding each of the issues identified in this RFP and other related business practices. Provide analysis of responses and a summary overview of key findings to Commission Staff.
7. Conduct independent research to identify national trends, common customer complaints/issues, carrier policies, and regulatory activities/actions taken by other states.
8. Review FCC activities and actions regarding traditional telephone services for relevant proceedings or policies.
9. Review FTC activities and actions in the areas of traditional telephone service trade and or billing practices and regulations.
10. Review of restoration issues, best practices and regulatory proceedings/actions related to telecommunications carriers in neighboring storm impacted coastal states (Texas, Mississippi, Alabama, Florida and Georgia).
11. Provide analysis of all independent research and prepare a summary overview of key findings for Commission Staff.
12. Assist Staff in drafting a report to the Commission including recommendations.
13. Assist Staff in overall docket management/administration as appropriate.

In addition to the work plan items listed above, it is further anticipated that the RFP in question will require additional efforts, including but not limited to the following: preparation for and participation in Technical Conference if deemed appropriate; issuance of additional data requests; further research and analysis of key issues; interaction with other state agencies and/or authorities and/or governmental bodies such as parish or municipal governments; and assisting staff during Commissioner briefings.

The scope of work provided herein shall continue, as directed by Staff, through the conclusion of the docket.

C) PERIOD OF REPRESENTATION

The time period of representation is projected by the RFP to be approximately 10-12 months. Consultant agrees that this is merely an estimate and is subject to change as required by docket circumstance and or the Commission.

D) MINIMUM REQUIREMENTS/EXPERIENCE

Mr. Demint worked in the telecommunications industry for approximately 40 years. He held a variety of positions at several different carriers and most recently served as Director of Governmental Affairs for AT&T Louisiana in Baton Rouge. While the majority of his career was spent at the AT&T/Bell System Companies (27 years), experience he gained at other entities including CenturyLink give Mr. Demint a well rounded perspective of the industry as a whole.

As the principal consultant of Richard/Carson & Associates, LLC, Mr. Demint has the requisite knowledge, experience and expertise to assist Staff and the Commission in the administration and completion of this docket. As an experienced former senior level representative of a major telecommunication service provider and current consultant to the Commission (Docket R-35568), Mr. Demint has vast experience in dealing with regulatory, administrative and legislative matters, including significant experience with the Louisiana Public Service Commission's Rules of Practice and Procedure and process, its members and Staff. Having participated in numerous Commission hearings and proceedings, Mr. Demint has a working knowledge of Commission dockets/orders regarding traditional telecommunication carriers, services and applicable FCC regulations.

Over a period of eight years, Mr. Demint served as the primary point of contact for all regulatory matters involving AT&T at the Louisiana Commission. During that time, he represented the company (and the industry in many cases) in numerous dockets including R-31300 (Service Quality) and R-32786 (Disaster Best Practice) as examples relevant to the docket at issue in this RFP. Mr. Demint provided comments to Staff, participated in Technical Conferences and provided testimony during open session on many occasions. He also worked with the LPSC Executive Secretary and Staff during storm or other disastrous events at GOHSEP. Accordingly, he has first hand experience in Commission storm recovery processes, reporting requirements, media obligations and customer complaints. This experience also includes customer billing issues/credits post storm, Commission Orders regarding disconnection of service and associated costs/financial impacts experienced by providers.

The experience and institutional knowledge of Mr. Demint is particularly suited to be invaluable to the Commission and Staff in the management and completion of the above referenced docket. Additional information is available upon request.

E) BILLING

All billing will be submitted pursuant to the requirements of the November 10, 2014 General Order of the Commission, including a description of all work performed, person performing the work, and the time and charge for such work. Billing will additionally show the total amount billed to date and remaining budget/authorized original estimate. Bills will be issued in strict accordance with the guidelines of the Commission. Expenses including receipts and other supporting documentation will be shown separately.

F) ESTIMATE OF COSTS

It is anticipated that the scope of representation and work plan set forth hereinabove will require a maximum total of fees not to exceed \$47,250.00 at an hourly rate of \$225.00 per hour. It is further anticipated that costs and/or expenses incurred in connection with these efforts will not exceed \$1,650.00. Accordingly, the total proposed budget for the services of this firm as outside contract consultants consists of the following respective fees and expenses:

Maximum Fees:	\$47,250.00
Expenses:	1,650.00
Total fees and Expenses	\$48,900.00

G) CONFLICT OF INTEREST

Richard/Carson & Associates, LLC is unaware of any current or past employment which could result in a conflict of interest regarding this RFP/Docket. Upon retirement from AT&T in March of 2020, Mr. Demint was not bound for any period of time by non-compete/non-disclosure agreement or any other conditions as a result of his employment.

H) SUBMISSION OF PROPOSAL

Richard/Carson & Associates, LLC respectfully submits this response to Commission RFP 12-31 by emailed electronic copy and hand-delivered original plus two copies on this 30th Day of November, 2021.

In the event you or any member of Staff needs additional information or clarification of the contents of this Proposal, please do not hesitate to contact me at your convenience.

We appreciate the opportunity to respond to the above-referenced RFP, and look forward to being of continued service to the Commission and Staff.

Respectfully Submitted,



Richard S. Demint